

**GISKAN SOLOTAROFF & ANDERSON LLP**  
Attorneys at Law

January 2, 2020

**BY ECF**

The Honorable Gregory H. Woods  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:    *Williams v. Construction Realty Services Group, Inc., et al.***  
**Case No.: 19-cv-02973 (GHW)**

Dear Judge Woods:

My firm represents Plaintiff Tierra Williams in the above-referenced matter. On behalf of both parties, I write pursuant to the Court's August 19, 2019 order to provide the requested information in advance of the status conference scheduled for January 8, 2020 at 12:00 noon.

(1) all existing deadlines, due dates, and/or cut-off dates: Discovery closed on December 17, 2019. The only existing deadline is for submission of the Draft Pre-Trial order on January 17, 2020.

(2) a brief description of any outstanding motions: None

(3) a brief description of the status of discovery and of any additional discovery that remains to be completed: Discovery is completed

(4) the status of settlement discussions: This case and others are part of global settlement discussions. Those discussions are ongoing.

(5) the anticipated length of trial and whether the case is to be tried to a jury: The parties anticipate a two to three-day trial before a jury.

(6) whether the parties anticipate filing motions for summary judgment: Plaintiff does not intend to file a summary judgment motion. Defendants do not intend to file a summary judgment motion.

(7) Any other issue that the parties would like to address at the pretrial conference or any other information that the parties believe may assist the Court: The parties do not have any additional information to address.

Thank you for your attention to this matter.

Sincerely yours,

/s

Jason L. Solotaroff

cc: Lisa Skruck, Esq.